

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
)	
v.)	Crim. No. 04-10345-NMG
)	
MOHAMMED ABDUL RASHEED QURAISHI,)	
MOHAMMED ABDUL QAYIUM QURAISHI,)	
MOHAMMED ABDUL AZIZ QURAISHI,)	
)	
Defendants)	
)	

**ASSENTED-TO EMERGENCY MOTION OF RASHEED QURAISHI
TO EXTEND SELF-SURRENDER DATE FOR ONE WEEK**

For the reasons that follow, the defendant Mohammed Abdul Rasheed Quraishi (“Rasheed”) respectfully requests that this Honorable Court extend his self-surrender date for one week, until May 18, 2007.

Rasheed was sentenced in this matter on March 30, 2007. A Judgment entered against him on April 11, 2007. See Docket No. 115. Rasheed is currently scheduled to self-surrender to the Bureau of Prisons by 2 p.m. on Friday, May 11, 2007.

In the Judgment, the Court made a recommendation that the BOP designate Rasheed to a facility at Oxford, Wisconsin, to facilitate visitation with his wife and two young children who live near Chicago, Illinois.¹ Counsel recently learned that all brothers have been designated to a facility in Big Springs, Texas, a great distance from their families. After discussions with the BOP designation center, counsel for Qayium made a written request, on behalf of all three brothers, seeking to have the BOP re-

¹ Similarly, the Court made a recommendation that the BOP designate Rasheed’s brothers, Qayium and Aziz, who are co-defendants in this matter, to a facility that will facilitate visitation with their families in Massachusetts.

designate the brothers to facilities closer to their families. That request to BOP for re-designation is still pending at this time.

A one-week extension of Rasheed's self-surrender date is reasonable and necessary to allow more time for the pending re-designation request to be resolved.² The United States, through Assistant U.S. Attorney Aloke Chakravarty, assents to the requested relief.

Accordingly, Rasheed respectfully requests that this Court allow this motion and set a self-surrender date of May 18, 2007.

Respectfully submitted,

MOHAMMED ABDUL RASHEED QURAISHI,
By his attorneys,

/s/ Frank A. Libby, Jr.

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Dated: May 8, 2007

CERTIFICATE OF SERVICE

I, Frank A. Libby, Jr., certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent by regular mail to those, if any, indicated as non registered participants.

/s/ Frank A. Libby, Jr.

² This motion to extend the self-surrender date to May 18, 2007 is made only by Rasheed, as his two brothers already have a self-surrender date of May 18, 2007. If the Court allows this motion, then all three brothers will be required to self-surrender on the same date.